

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

The Estate of DONTE' DEVEL SHANNON,)	
ex. Rel. Personal Representative,)	No. 2:18-cv-194
VIVIAN JOHNSON,)	
)	Judge J.P. Stadtmueller
Plaintiff,)	
)	
v.)	
)	DEMAND TRIAL BY JURY
The CITY OF RACINE, WISCONSIN,)	
RACINE POLICE OFFICER CHAD STILLMAN,)	
and RACINE POLICE OFFICER PETER BOECK,)	
)	
Defendants)	

UN-OPPOSED MOTION TO WITHDRAW AS PLAINTIFF'S ATTORNEYS
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 11

NOW COME Plaintiff's attorneys, Brian Orozco, Gregory E. Kulis of Gregory E. Kulis & Associates, Ltd., and move this Honorable Court to grant their motion to withdraw their appearances on behalf of the Plaintiff, VIVIAN JOHNSON, and in support thereof, state as follows:

1. Since the filing of Plaintiff's complaint, Plaintiff's counsel has reviewed over ten thousand (10,000) pages of documents, hours of video and audio footage has conducted interviews of multiple individuals involved with the case, and has taken the deposition of the main Defendant in this case, Defendant Chad Stillman.

2. Based on this review as well as conversations with the Plaintiff, the Plaintiff and counsel have irreconcilable differences over issues arising out of this litigation as well as over the management and direction of the litigation. Counsel suggests that under these circumstances, they are unable to effectively and properly continue in their representation of the Plaintiff, and

therefore counsel moves to withdraw as attorneys of record in the above-entitled and numbered action and no longer be sent further notices of the court.

3. The Plaintiff's counsel has informed via telephone the Plaintiff of their intention to withdraw as counsel. A copy of this motion is going out via certified mail today.

4. Brian Orozco and Gregory E. Kulis wish to withdraw as Plaintiff's attorneys in this case.

5. The Plaintiff should be given 45 days to obtain new counsel.

6. The undersigned counsel conferred with counsel for the Defendants, John Wolfgang, who indicated that he did not oppose Plaintiff's motion.

WHEREFORE, Plaintiffs' attorneys, Brian Orozco and Gregory E. Kulis, pray that this Honorable Court enter an order granting their motion to withdraw their appearances on behalf of the Plaintiff in this matter.

Respectfully submitted,

/s/ Gregory E. Kulis
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